

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD. and
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Case No. 2:24-CV-00627-JRG-RSP

JURY TRIAL DEMANDED

JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT

Pursuant to Local Patent Rule 4-3, and the Court's Docket Control Order (Dkt. 43), Plaintiff Headwater Research, LLC ("Headwater") and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (collectively, "Defendants" or "Samsung") (all together, the "parties") respectfully submit the following Joint Claim Construction and Prehearing Statement.

I. AGREED CLAIM CONSTRUCTIONS (P.R. 4-3(A)(1))

The parties have not identified any agreed claim constructions.

II. DISPUTED CLAIM CONSTRUCTIONS (P.R. 4-3(A)(2))

The parties' proposed constructions of disputed terms are provided in the chart below. The parties' proposed constructions are also set forth in the accompanying Exhibit A, along with the intrinsic and extrinsic evidence on which the parties intend to rely. In support of Samsung's proposed constructions, Dr. Dan Schonfeld's expert declaration and CV are also being served upon Headwater in accordance with P.R. 4-3(b).

A. U.S. Patent No. 10,028,144

Term No.	Claim Term	Headwater's Proposed Construction	Samsung's Proposed Construction
1	protected execution partition	Plain and ordinary meaning, an example of which is an execution partition that cannot be accessed without authorization.	“an execution partition that cannot be accessed without authorization”
2	agent	Plain and ordinary meaning.	“a piece of software that performs certain functions for other software”
3	device agent	Plain and ordinary meaning, an example of which is a piece of software on the end-user device that performs certain functions for other software.	“a piece of software on the end-user device that performs certain functions for other software”

B. U.S. Patent No. 10,080,250

Term No.	Claim Term	Headwater's Proposed Construction	Samsung's Proposed Construction
4	secure policy information	Not indefinite; plain and ordinary meaning	Indefinite.
5	application-specific execution environment policy	Not indefinite; plain and ordinary meaning	Indefinite.
6	configurable communication security policy	Not indefinite; plain and ordinary meaning	Indefinite.

III. ANTICIPATED LENGTH OF TIME NEEDED FOR THE CLAIM CONSTRUCTION HEARING (P.R. 4-3(A)(3))

The parties estimate that no more than three hours will be needed for the claim construction hearing. The parties agree that each side will be allocated half of the total time permitted for the hearing.

IV. PROPOSED WITNESSES TO BE USED AT THE CLAIM CONSTRUCTION HEARING (P.R. 4-3(A)(4))

No party proposes to call witnesses at the claim construction hearing.

V. OTHER ISSUES TO BE ADDRESSED PRIOR TO CLAIM CONSTRUCTION HEARING (P.R. 4-3(A)(5))

The parties are not currently aware of any issues that they would propose taking up at a prehearing conference prior to the claim construction hearing.

Dated: August 22, 2025

Respectfully submitted,

/s/ Marc Fenster

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CERTIFICATE OF SERVICE

I hereby certify that on August 22, 2025, I served the foregoing document via electronic service on all counsel of record.

/s/ Marc Fenster
Marc Fenster